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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

IRINA NEDASHKOVSKIY,)	Case No. 2:22-cv-0410-JDP
)	
Plaintiff,)	STIPULATED MOTION AND PROPOSED
)	ORDER FOR AN EXTENSION OF TIME
vs.)	TO RESPOND TO PLAINTIFF'S MOTION
KILOLO KIJAKAZI,)	FOR SUMMARY JUDGMENT
Commissioner of Social Security,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended forty-five (45) days from November 29, 2022, up to and including January 13, 2023. This is Defendant's second request for an extension. Counsel for Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Counsel for Defendant requires additional time to consult with his client regarding this case. Counsel for Defendant was assigned this matter on October 27, 2022, and entered his appearance on October 28, 2022 (Dkt. 16). Thereafter,

counsel for Defendant prepared and filed six cross-motions for summary judgment or responsive merits briefs in district court matters, negotiated and filed one request for voluntary remand, and assisted attorneys working in another regional office on matters pending before other district courts. Further, counsel for Defendant was out of the office on November 4, 2022, to attend a funeral and was out of the office for pre-approved leave on November 10 and 25, 2022.

Upon review of the transcript in this matter and the issues raised in Plaintiff's Motion for Summary Judgment, counsel for Defendant requires additional time to consult with his client. Due to the upcoming holiday season and lack of certainty about staff availability, counsel for Defendant requests an additional 45 days for this consultation. Counsel apologizes to the Court for any inconvenience caused by this delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

Respectfully submitted,

Dated: November 28, 2022

/s/ Jesse S. Kaplan
JESSE S. KAPLAN
Attorney for Plaintiff
(authorized via e-mail November 28, 2022)

Dated: November 28, 2022

PHILLIP A. TALBERT
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By: /s/ Noah Schabacker
NOAH SCHABACKER
Special Assistant U.S. Attorney
Attorneys for Defendant

~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation, and for good cause shown, IT IS ORDERED that Defendant shall have an extension of 45 days, up to and including January 13, 2023, to respond to Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: December 1, 2022


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE